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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

**EARL GAVIN**

Plaintiff.

vs

**EXPERIAN INFORMATION  
SOLUTIONS, INC.; TRANS UNION  
LLC; EQUIFAX, INC.**

Defendants

**Case No 7:18-cv-00523-DCC-JDA**

**PLAINTIFF S MOTION AND MEMORANDUM IN SUPPORT  
FOR LEAVE TO FILE AMENDED COMPLAINT**

Plaintiff requests leave of the Court to file an Amended Complaint to add an additional party and clarify claims made.

**A. Introduction**

1. Plaintiff is Earl Gavin; Defendants are Experian Information Solutions, Inc.

(Experian), Equifax, Inc. (Equifax) and Trans Union LLC (Trans Union).

2. Plaintiff sued Defendants for violations of the FCRA.

3. Defendants Experian and Transunion have filed an Answer along with Motion to Dismiss which is pending before the Court.

**B. Argument**

4. Unless the opposing party can show prejudice, bad faith, or undue delay, a court should grant leave to file an amended pleading. Foman v. Davis, 371 U.S. 178, 182, 83 S.Ct.

227, 230 (1962). Leave to amend should be freely given when justice so requires. Fed. R. Civ. P. 15(a); Walton v. Mental Health Ass'n, 168 F.3d 661, 665, (3d Cir. 1999).

5. The court should allow the filing of Plaintiff's amended pleading because it properly corrects deficiencies in Plaintiff's Original Complaint and allows a necessary party to be added to this action.

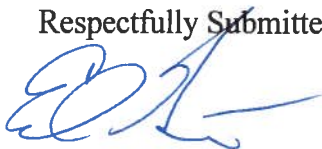
6. Defendants will not be prejudiced by Plaintiff's amended pleading.

7. Plaintiff is attaching his amended pleading to this Motion.

**C. Conclusion**

8. The Plaintiff has amended his Original Complaint to clarify issues presented and to add a necessary additional party to this action. Plaintiff requests the Court grant leave to file the Amended Complaint.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Earl Gavin', is written over the typed name.

Earl Gavin

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document was served on the parties listed below by email on the date below.

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